

Investigation by the Department of Telecommunications and Energy into the Petition of New England Gas Company for approval of a Firm Gas Transportation Agreement with the Algonquin Gas Transportation Transmission Company)))))))	D.T.E. 02-39
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The following are the Attorney General's First Set of Document and Information Requests in the above captioned proceeding.

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to New England Gas Company or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide four copies of each response.
16. The term “Company” refers to New England Gas Company. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

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until August 1, 2002, given that Algonquin's May 24, 2002 notification states that any changes to the rate would be provided by June 3, 2002.

- AG-1-6 Refer to Attachment B. Is the proposed HubLine rate a negotiated rate? If yes, please provide the equivalent recourse rate. Is Attachment B the standard form for notification of acceptance of a negotiated rate? If not, explain why this form was used. Does Algonquin consider the rate to be a negotiated rate? If Algonquin's opinion differs from the Company's characterization of the rate, explain the basis for the difference.
- AG-1-7 Please provide the "locked in" rate and copies of all correspondence from Algonquin regarding the rate.
- AG-1-8 Please revise the Company's Attachment F by incorporating the "locked in" rates for the HubLine service, if necessary.
- AG-1-9 Please provide signed and dated copies of all HubLine related agreements. Including, but not limited to, the Precedent Agreement, the Service Agreement (referred to in § 4 of the Precedent Agreement), and all contracts for gas supply for delivery via the HubLine.
- AG-1-10 When did the Company first begin discussions with Algonquin regarding the new gate station to be constructed in Freetown? Provide copies of all correspondence, notes, records of communications and other related documents and materials related to the gate station discussion and agreement to construct. Include all correspondence, notes, etc. related to requirements of § 2 of the Precedent Agreement.
- AG-1-11 Will the new gate station be a primary receipt point? If yes, identify all contracts that will include this station as a primary delivery point. If no, explain how the station will function (for pressure only, secondary delivery point or other functions-describe). Why is it critical that the construction of this facility begin September 1, 2002 (see statement made in July 1, 2002 cover letter to Secretary Cottrell, p. 2)? Please provide copies of all agreements between the Company and Algonquin related to the new gate station.
- AG-1-12 Please provide, for each customer currently served on an interruptible basis, the monthly volumes provided during the years 1997-2001. Indicate whether each customer is served under an IT only arrangement or is served under both IT and IS agreements or special contracts. Provide unredacted copies of all contracts between the Company and each of these customers that were in effect during the period 1998-present.

- AG-1-13 Did the Company's filing in D.T.E. 99-26 identify the problems discussed on pages 13-14 of the Company's Explanatory Statement regarding problems serving the northern part of its distribution system? If yes, please provide copies of the relevant excerpts from the filing. If no, please quantify the risk the Company is exposing its customers to in the northern part of the distributions system in terms of the probability of system failure on design days. How many customers would be affected and to what degree if there were a system failure during:
- a.) a design day,
 - b.) during a design winter weekday, and
 - c.) and during a normal winter day?
- AG-1-14 Refer to the Company's Explanatory Statement, p. 14. Discuss the meaning and importance of the replacement of the one-way distribution feed with a two-way feed. How and when would this two-way feed be implemented?
- AG-1-15 Please provide a map of the Fall River distribution system and identify the "industrial development area" and the location of the new gate station. The map should include all the features identified on Attachment G and a key explaining each feature identified on both the maps. Identify and provide a description of all new facilities (mains, services, extensions, special metering, etc.) that Fall River plans to construct to serve customers utilizing the new gate station. Include the economic analysis showing the benefits of serving customers in the area to be served by the new gate station facilities. The analysis should include all supporting calculations, workpapers, and assumptions, including annual estimates of the number and demand of new customers, and contributions in aid of construction requirements.
- AG-1-16 Refer to the Company's Explanatory Statement, p. 8. Please describe the evaluation process that the Company will go through in determining which capacity resources will be replaced by the HubLine capacity. Discuss why the Company would consider terminating or reducing volumes under the Algonquin Contract No. 510026, which, according to the Company's economic analysis of the HubLine, costs less than the proposed HubLine service. If the evaluations and related analyses are available in a final or preliminary form, please provide. If these analyses are not available, provide an estimate of the date of completion and availability.
- AG-1-17 Refer to Attachment F(2). Please provide all the source documents, calculations, workpapers and assumptions supporting the price estimates. Does the Company know what the fuel retainage and applicable surcharges will be for the HubLine service? If yes, have these been incorporated in the commodity prices?
- AG-1-18 Please provide a list of witnesses the Company will present during the evidentiary

hearings in this docket. Provide 3 copies of their pre-filed testimony, redacted and unredacted.

Dated: August 5, 2002